

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR ST. LUCIE COUNTY, STATE OF FLORIDA**

STATE OF FLORIDA,

Plaintiff,

CASE NO.: 56 2014 CF 003032A

vs.

MICHAEL BEER,

Defendant.

**DEVEREUX COMMUNITY BASED CARE OF OKEECHOBEE AND THE TREASURE
COAST'S MOTION FOR PROTECTIVE ORDER**

COMES NOW, DEVEREUX COMMUNITY BASED CARE OF OKEECHOBEE AND THE TREASURE COAST ("Devereux"), by and through undersigned counsel, and in accordance with Rules 1.280 and 1.351 of the Florida Rules of Civil Procedure, files this Motion for Protective Order relating to Defendant's Subpoena for Production of Documents and Things, served on August 16, 2017. As a showing of good cause in support of the Motion, Devereux states as follows:

FACTUAL AND PROCEDURAL BACKGROUND

1. Devereux, a non-party to this action, is a not-for-profit corporation that provides oversight and coordination of the child-welfare system in St. Lucie and other Florida counties, including case management services. Beginning in 2013, Devereux provided case management services to foster children placed in the foster home of Defendant, Michael (and Michelle) Beer.

2. Minor child, [REDACTED] was placed in the Beer foster home on December 23, 2013, where [REDACTED] stayed until September 30, 2014. Minor children [REDACTED] and [REDACTED] were first temporarily placed in the Beer foster home on January 7, 2014, but left the following day. Thereafter [REDACTED] and [REDACTED] were again placed in the Beer foster home on July 29, 2014. [REDACTED] passed away on September 28, 2014. [REDACTED] remained in the Beer foster home until September 30, 2014.

3. On August 16, 2017, Defendant, Michael Beer, served Devereux with a Subpoena for Production of Documents and Things (the “Subpoena”). A true and correct copy of the Subpoena is attached hereto as Exhibit “A”.

4. The Subpoena contains the following *duces tecum* request:

Any and all records, in the entirety, regarding foster care between Michael Edward Beer, whose date of birth is 12/06/1966, and [REDACTED]

5. Rule 1.351(c) of the Florida Rules of Civil Procedure permits a non-party recipient of a subpoena *duces tecum* to raise an objection to same. *See also Franco v. Franco*, 704 So. 2d 1121, 1122 (Fla. 3d DCA 1998).

6. In accordance with Rule 1.351(c), Devereux served its Objection to Defendant’s Subpoena for Production of Documents and Things on September 15, 2017. A true and correct copy of Devereux’s Objection to Defendant’s Subpoena for Production of Documents and Things is attached hereto as Exhibit “B”.

7. In its objection, and as further elaborated herein, Devereux asserts that the Subpoena is vague, overbroad, and unduly burdensome. Furthermore, the Subpoena seeks information that is confidential and privileged and specifically protected by Chapter 39, *Florida Statutes*.

8. Devereux therefore respectfully requests that this Court grant the instant Motion for Protective Order. Alternatively, Devereux requests that this Court limit the scope of documents required to be produced, allow redaction of any private or sensitive information prior to production of same, and require payment of fees and costs necessary for the production of materials requested.

MEMORANDUM OF LAW

Rule 1.280(c) of the Florida Rules of Civil Procedure¹ confers broad discretion on the trial court to limit or prohibit discovery in order to "protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense." *See also CVS Caremark Corp. v. Latour*, 109 So. 3d 1232 (Fla. 1st DCA 2013); *Fortune Ins. Co. v. Santelli*, 621 So. 2d 546 (Fla. 3d DCA 1993) (citing Rule 1.280(c) that authorizes the court to grant a protective order if the discovery would be an undue burden or expense). In determining the permissible scope of discovery, the Court must balance the effect of a discovery request on a party's fundamental constitutional right to privacy and other interests against the requesting party's need for such information. *Rasmussen v. South Florida Blood Service, Inc.*, 500 So. 2d 533, 535 (Fla. 1987).

In this case, the Subpoena is vague and overbroad in that it requests "[a]ny and all records, in the entirety, regarding foster care between Michael Edward Beer" and three foster children. *See* Exhibit A. The Subpoena fails to define what is meant by "foster care," and Devereux should not be forced to speculate as to the meaning of the request.

The Subpoena further fails to limit the requested information by either time, date, or scope, and as such, calls for the production of thousands of pages of records without regard to cost and without a showing of need. It is undeniable that compliance with the Subpoena as phrased would result in undue burden and expense. As set forth in the Affidavit of Anthony M. Iannacio, Esq., attached hereto as Exhibit "C,"² the personnel time and costs associated with retrieval, review,

¹ Although there is no rule of criminal procedure which provides for protective orders, this Court has the inherent authority to issue protective orders involving production of tangible property by third parties. *See CBS, Inc. v. Jackson*, 578 So. 2d 698, 700 (Fla. 1991) (citing Fla. R. Civ. P. 1.280(c)).

² *See Winn-Dixie Stores, Inc. v. Miles*, 616 So. 2d 1108, 1111 (Fla. 5th DCA 1993) (Holding that because a non-party's affidavit establishing that compliance with a subpoena would be overburdensome was unrefuted, he was entitled to the protective order he sought).

redaction, and production of the thousands of pages of documents that could possibly be responsive to this request are substantial. For example, Mr. Iannacio and his staff previously reviewed records in response to a similar request in a dependency case (Number 562013DP000235A&C) involving the parents of and two of the foster children named in the Subpoena. Such request required review of tens of thousands of pages of records, which took almost 300 hours of time, and incurred almost \$40,000.00 in fees. An initial email search alone identified more than 49,000 emails, many of which exceeded 50 or more pages. Each email needed to be converted from an outlook file (“pst”) into a PDF file for printing. Once this was completed, each document needed to be reviewed and any confidential information redacted. In fact, the requested documents were so voluminous and extensive that Devereux was forced to retain an outside litigation support service at significant expense. The efforts to comply with the Subpoena in this case will be similar, if not more extensive. As a result, the Subpoena purports to impose upon Devereux obligations beyond those set forth in the Florida Rules of Civil Procedure.

Perhaps more importantly, the Subpoena seeks information that is confidential and privileged, in that it seeks sensitive information related to minor children in foster care. Section 39.00145(2), *Florida Statutes*, provides that records in a child’s case record can be made available for inspection upon request “to the child who is the subject of the case record and to the child’s caregiver, guardian ad litem, or attorney.” Michael Beer is currently not a caregiver, guardian ad litem, or attorney authorized to obtain the information sought in the Subpoena. Alternatively, Section 39.00145(3), *Florida Statutes*, permits release of records if a “court determines that sharing information in the child’s case record is necessary to ensure access to appropriate services for the child or for the safety of the child.” However, there is no provision permitting release of such information for use of building a defense in a criminal case. As a result, Chapter 39 prohibits release of the information sought by the Subpoena.

A court can grant a motion for protective order that was filed to prevent disclosure of information that is protected by the right of privacy. *See Rasmussen*, 500 So. 2d 533; *Age Institute of Florida, Inc. v. McGriff*, 884 So. 2d 512 (Fla. 2d DCA 2004). As a result, this Court should grant the instant Motion to prevent disclosure of this sensitive information.

Finally, the Florida Rules of Civil Procedure also protect against discovery where such discovery is neither relevant nor will lead to discovery of admissible information. *See Fla. R. Civ. P. 1.280(b)(1)*; *Allstate Insurance v. Langston*, 655 So. 2d 91 (Fla. 1995); *Manatee County v. Estech General Chemicals Co.*, 4027 So. 2d 75 (Fla. 2d DCA 1981). There has been no showing that the information contained in its records are likely to lead to the discovery of admissible evidence in this case.

Overall, sufficient grounds exist for this Court to grant this Motion and to enter an order quashing the Subpoena and issue a protective order providing that Devereux need not comply with the Subpoena. Alternatively, Devereux requests the Court to enter an order requiring counsel for Defendant to narrow the scope of documents sought and to state with clarity and specificity the documents needed and being requested. Further, pursuant to Rules 1.380(a)(4) and 1.310(d) of the Florida Rules of Civil Procedure, Devereux requests that the Court order counsel for Defendant to advance the reasonable expenses, including attorney's fees, that Devereux will incur in relation to complying with any subpoena.

WHEREFORE, non-party, DEVEREUX COMMUNITY BASED CARE OF OKEECHOBEE AND THE TREASURE COAST, respectfully requests the Court to grant this Motion, quash the Subpoena, and enter a protective order consistent with this Motion. Devereux also requests an award of attorney's fees and costs incurred as a result of bring this motion before the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the above and foregoing has been furnished by electronic mail delivery on this 26th day of January, 2018 to Office of the State Attorney, sal9e-service@sao19.org, 411 S. 2nd St., Ft. Pierce, FL 34950 and to Lance P. Richards, Esq., Attorney for Defendant, 51 SE Ocean Boulevard, Stuart, Florida 34994, lrichard@lrichardlaw.com; cshaler@lrichardlaw.com.

BUSH GRAZIANO RICE & PLATTER, P.A.

/s/ Anthony M. Iannacio

Anthony M. Iannacio, Florida Bar No. 144215

Ashley v. Goodman, Florida Bar No. 111995

100 South Ashley Drive, Suite 1400 (33602)

P.O. Box 3423

Tampa, Florida 33601-3423

813.228.7000 (voice), 813.273.0091 (fax)

Primary Email: eserve@bgrplaw.com

Second Email: salbee@bgrplaw.com

Attorneys for Devereux Community Based Care, Inc.

Served: Hendrick
Date: 8/18/17 Time: 4:20
CPS#: 8933

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR ST. LUCIE COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO.: 56 2014 CF 003032A

Plaintiff,

v.

MICHAEL BEER,

Defendant.

SUBPOENA FOR PRODUCTION OF DOCUMENTS AND THINGS

THE STATE OF FLORIDA

TO: Devereux Community Based Care
of Okeechobee and the Treasure Coast
117 N 2nd Street
Fort Pierce, Florida 34950
Phone-(772)-672-3574 ext. 8454
Fax- (772)-252-4482

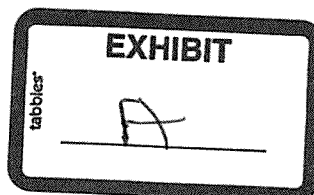
YOU ARE COMMANDED to deliver to Lance P. Richard, PA, 51 East Ocean Boulevard,
Stuart, FL 34994, on or before 9/18/2017, by 10:00 a.m., the following items:

Any and all records, in the entirety, regarding foster care between Michael
Edward Beer, whose date of birth is 12/06/1966, and [REDACTED]
[REDACTED]

You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena by mail or delivery. You may condition the preparation of the copies upon payment, in advance, of the reasonable cost of preparing the copies. You have the right to object to the production pursuant to this subpoena at any time before production, by giving written notice to the attorney whose name appears on this subpoena. You will not be required to surrender any of the documents or things requested.

If you fail to furnish the records as provided above or timely object to this subpoena you may be in contempt of court. You are subpoenaed by the attorney whose name appears below and unless excused from the subpoena by the attorney or by the Court, you shall respond to the subpoena as directed.

THIS IS FOR RECORDS PICK-UP ONLY. NO TESTIMONY WILL BE TAKEN.



DATED: June 26, 2017.

Respectfully submitted,

By: 

Lance P. Richard, Esq.

Florida Bar No. 0044156

LANCE P. RICHARD, P.A.

51 SE Ocean Blvd.

Stuart, FL 34994

Tel. (772) 223-9600

Fax (772) 223-0859

E-Mail: lrichard@lrichardlaw.com

2nd Email: cshaler@lrichardlaw.com

Attorney for Defendant

IN THE CIRCUIT COURT FOR THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR ST LUCIE COUNTY, FLORIDA

STATE OF FLORIDA

Case No.: 14-3032-CFA

Plaintiff

v.

MICHAEL E. BEER,

Defendant

_____ /

AFFIDAVIT OF AUTHENTICITY

I, _____, do hereby swear and/or affirm to the following:

1. I am employed by _____
as a _____.
2. I maintain the records as a part of my job responsibility.
3. I am the custodian of records for these documents.
4. Pursuant to the Subpoena Duces Tecum for Production of Documents and Things issued by Lance P. Richard, Esq., regarding Trystan Eli Frank Adams, the attached documents are a true, exact, complete and unaltered photocopy made by me of the originals which are:
 - a. made as a regular practice in the course of our regularly conducted activity;
 - b. made at or near the time of the occurrence of the matters set forth by, or from information transmitted by a person having knowledge of those matters;
 - c. kept in the ordinary course of business.

I understand that I am swearing or affirming under oath to the truthfulness of these statements and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: _____, 2017

Affiant

STATE OF FLORIDA

)

)

COUNTY OF SAINT LUCIE

)

SWORN TO AND SUBSCRIBED before me, this _____ day of _____, 2017,
by _____, who is personally known to me or who has
produced a valid Fla. Driver's license as identification.

NOTARY PUBLIC

Notary Stamp-My Commission Expires

PLEASE AUTHENTICATE YOUR RECORDS FOR THE COURT BY HAVING THE APPROPRIATE PERSON COMPLETE THE ATTACHED AFFIDAVIT. THEIR SIGNATURE NEEDS TO BE NOTARIZED AND THE ORIGINAL AFFIDAVIT RETURNED TO ATTORNEY LANCE RICHARD WITH THE RECORDS YOU ARE PROVIDING. BY DOING SO, YOU ELIMINATE THE NEED OF HAVING A RECORDS CUSTODIAN BE PRESENT IN COURT TO AUTHENTICATE THESE RECORDS.

PLEASE CONTACT OUR OFFICE SHOULD YOU HAVE ANY QUESTIONS.

THANK YOU.

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR ST. LUCIE COUNTY, STATE OF FLORIDA

STATE OF FLORIDA,

Plaintiff,

CASE NO.: 56 2014 CF 003032A

vs.

MICHAEL BEER,

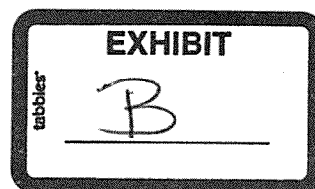
Defendant.

DEVEREUX COMMUNITY BASED CARE OF OKEECHOBEE AND THE TREASURE
COAST'S OBJECTION TO DEFENDANT'S SUBPOENA FOR PRODUCTION OF
DOCUMENTS AND THINGS

COMES NOW, DEVEREUX COMMUNITY BASED CARE OF OKEECHOBEE AND THE TREASURE COAST ("Devereux"), by and through undersigned counsel, and pursuant to Rule 1.351 of the Florida Rules of Civil Procedure, hereby files this objection to Defendant's Subpoena for Production of Documents and Things, served on August 16, 2017, and in support thereof states as follows:

1. Devereux is a non-party to this action.
2. On August 16, 2017, Defendant, Michael Beer, served Devereux with a Subpoena for Production of Documents and Things (the "Subpoena"). The Subpoena is attached hereto as Exhibit "A".
3. The Subpoena contains the following *duces tecum* request:

Any and all records, in the entirety, regarding foster care between Michael Edward Beer, whose date of birth is 12/06/1966, and [REDACTED]
[REDACTED]



4. Rule 1.351(c) of the Florida Rules of Civil Procedure permits a non-party recipient of a subpoena *duces tecum* to raise an objection to same. *See also Franco v. Franco*, 704 So. 2d 1121, 1122 (Fla. 3d DCA 1998).

5. That rule provides in pertinent part that, “[i]f the person upon whom the subpoena is served objects at any time before the production of the documents or things, the documents or things shall not be produced under this rule, and relief may be obtained pursuant to rule 1.310.”

6. Devereux objects to the Subpoena on the grounds that it is vague, overbroad and unduly burdensome. The personnel time and costs associated with review of thousands of pages of documents that could possibly be responsive to this request are substantial, and thus the Subpoena purports to impose upon Devereux obligations beyond those set forth in the Florida Rules of Civil Procedure. Lastly, and perhaps most importantly, the Subpoena seeks information that is confidential and privileged, in that it seeks sensitive information related to minor children in foster care. Michael Beer is not a custodial parent, caregiver, guardian ad litem, or attorney authorized to obtain the information sought in the Subpoena, and thus Chapter 39, Florida Statutes, prohibits its release.

7. Fla. R. Civ. P. 1.280(c) confers broad discretion on the trial court to limit or prohibit discovery in order to "protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense." In determining the permissible scope of discovery, the Court must balance the effect of a discovery request on a party's fundamental constitutional right to privacy and other interests against the requesting party's need for such information. *Rasmussen v. South Florida Blood Service, Inc.*, 500 So. 2d 533, 535 (Fla. 1987).

8. In the instant case, the information sought is overly broad and seeks confidential and private information which is specifically protected by Statute.

WHEREFORE, DEVEREUX COMMUNITY BASED CARE OF OKEECHOBEE AND THE TREASURE COAST, by and through undersigned counsel, respectfully requests that this Court enter an Order prohibiting the production of the documents requested in Defendant's Subpoena, and for any such other relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the above and foregoing has been furnished by electronic mail delivery on this 15th day of September, 2017 to Lance P. Richards, Esq., Attorney for Defendant, 51 SE Ocean Boulevard, Stuart, Florida 34994, lrichard@lrichardlaw.com; cshaler@lrichardlaw.com.

BUSH GRAZIANO RICE & PLATTER, P.A.

/s/ Ashley V. Goodman

Anthony M. Iannacio, Florida Bar No. 144215

Ashley v. Goodman, Florida Bar No. 111995

100 South Ashley Drive, Suite 1400 (33602)

P.O. Box 3423

Tampa, Florida 33601-3423

813.228.7000 (voice), 813.273.0091 (fax)

Primary Email: eserve@bgrplaw.com

Second Email: salbee@bgrplaw.com

Attorneys for Devereux Community Based Care, Inc.

Served: Hendrick
Date: 8/11/17 Time: 4:20
CPS# 8923

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR ST. LUCIE COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO.: 56 2014 CF 003032A

Plaintiff,

v.

MICHAEL BEER,

Defendant.

SUBPOENA FOR PRODUCTION OF DOCUMENTS AND THINGS

THE STATE OF FLORIDA

**TO: Devereux Community Based Care
of Okeechobee and the Treasure Coast
117 N 2nd Street
Fort Pierce, Florida 34950
Phone-(772)-672-3574 ext. 8454
Fax- (772)-252-4482**

YOU ARE COMMANDED to deliver to Lance P. Richard, PA, 51 East Ocean Boulevard,
Stuart, FL 34994, on or before 9/18/2017, by 10:00 a.m., the following items:

**Any and all records, in the entirety, regarding foster care between Michael
Edward Beer, whose date of birth is 12/06/1966, and [REDACTED]**

You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena by mail or delivery. You may condition the preparation of the copies upon payment, in advance, of the reasonable cost of preparing the copies. You have the right to object to the production pursuant to this subpoena at any time before production, by giving written notice to the attorney whose name appears on this subpoena. You will not be required to surrender any of the documents or things requested.

If you fail to furnish the records as provided above or timely object to this subpoena you may be in contempt of court. You are subpoenaed by the attorney whose name appears below and unless excused from the subpoena by the attorney or by the Court, you shall respond to the subpoena as directed.

THIS IS FOR RECORDS PICK-UP ONLY. NO TESTIMONY WILL BE TAKEN.

Exhibit A

DATED: June 26, 2017.

Respectfully submitted,

By: 

Lance P. Richard, Esq.
Florida Bar No. 0044156
LANCE P. RICHARD, P.A.
51 SE Ocean Blvd.
Stuart, FL 34994
Tel. (772) 223-9600
Fax (772) 223-0859
E-Mail: lrichard@lrichardlaw.com
2nd Email: cshaler@lrichardlaw.com
Attorney for Defendant

IN THE CIRCUIT COURT FOR THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR ST LUCIE COUNTY, FLORIDA

STATE OF FLORIDA

Case No.: 14-3032-CFA

Plaintiff

v.

MICHAEL E. BEER,

Defendant

_____ /

AFFIDAVIT OF AUTHENTICITY

I, _____, do hereby swear and/or affirm to the following:

1. I am employed by _____,
as a _____.

2. I maintain the records as a part of my job responsibility.

3. I am the custodian of records for these documents.

4. Pursuant to the Subpoena Duces Tecum for Production of Documents and Things issued by Lance P. Richard, Esq., regarding _____ the attached documents are a true, exact, complete and unaltered photocopy made by me of the originals which are:

- a. made as a regular practice in the course of our regularly conducted activity;
- b. made at or near the time of the occurrence of the matters set forth by, or from information transmitted by a person having knowledge of those matters;
- c. kept in the ordinary course of business.

I understand that I am swearing or affirming under oath to the truthfulness of these statements and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: _____, 2017

Affiant

STATE OF FLORIDA)
)
COUNTY OF SAINT LUCIE)

SWORN TO AND SUBSCRIBED before me, this _____ day of _____, 2017,
by _____, who is personally known to me or who has
produced a valid Fla. Driver's license as identification.

NOTARY PUBLIC

Notary Stamp-My Commission Expires

PLEASE AUTHENTICATE YOUR RECORDS FOR THE COURT BY HAVING THE APPROPRIATE PERSON COMPLETE THE ATTACHED AFFIDAVIT. THEIR SIGNATURE NEEDS TO BE NOTARIZED AND THE ORIGINAL AFFIDAVIT RETURNED TO ATTORNEY LANCE RICHARD WITH THE RECORDS YOU ARE PROVIDING. BY DOING SO, YOU ELIMINATE THE NEED OF HAVING A RECORDS CUSTODIAN BE PRESENT IN COURT TO AUTHENTICATE THESE RECORDS.

PLEASE CONTACT OUR OFFICE SHOULD YOU HAVE ANY QUESTIONS.

THANK YOU.

AFFIDAVIT OF ANTHONY M. IANNACIO, ESQ.

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

BEFORE ME, the undersigned authority, personally appeared Anthony M. Iannacio, Esq., who, after being first duly sworn, deposes and states:

1. I am counsel for Devereux Community Based Care of Okeechobee and The Treasure Coast ("Devereux") and am familiar with the facts and circumstances of this action.

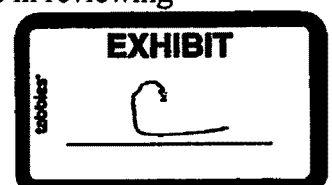
2. This Affidavit is being filed in support of Devereux's Motion for a Protective Order filed herein.

3. I have reviewed the Subpoena for Production of Documents and Things served on Devereux on August 16, 2017 by Defendant, Michael Beer, seeking "[a]ny and all records, in the entirety, regarding foster care between Michael Edward Beer, whose date of birth is 12/06/1966, and [REDACTED]"

4. As phrased, the request seeks all information related to three separate foster children as well as to Mr. Beer. Upon initial review, Mr. Beer first became a foster parent in St. Lucie County in 2013. Each child designated in the Subpoena was placed with Mr. Beer for at least several months, with one being placed for almost a year. Devereux will thus need to comb through thousands of pages of documents to determine which could possibly be responsive to this request.

5. The personnel time and costs associated with retrieval, review, redaction, and production are substantial.

6. In reviewing records in response to a similar request in a dependency case (Number 562013DP000235A&C) involving the parents of two of the foster children named in the Subpoena, our office spent more than 300 hours of time and incurred more than \$30,000 in fees in reviewing

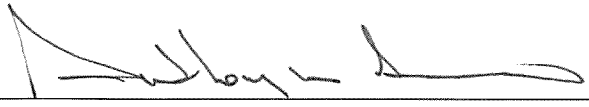


tens of thousands of pages of records. An initial search previously performed on just e-mails alone identified more than 49,000 emails, many of which exceeded 50 or more pages. Each email had to be converted from an outlook file ("pst") into a PDF file for printing. Once this was completed, each document needed to be reviewed and any confidential information redacted. In fact, the requested documents were so voluminous and extensive that Devereux was forced to retain an outside litigation support service at significant expense.

7. The efforts to comply with the Subpoena in this case would be similar, if not more extensive, then in the previous exercise.

8. As a result, compliance with the Subpoena would be unduly oppressive and overburdensome.

FURTHER AFFIANT SAYETH NAUGHT



Anthony M. Iannacio, Esq.

STATE OF FLORIDA

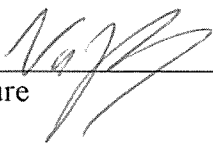
COUNTY OF HILLSBOROUGH

The foregoing Affidavit was acknowledged by me on this 26th day of January, 2018, by Anthony M. Iannacio, Esq. who is personally known to me or who has produced identification and who has hereby taken oath.

Notary Public State of Florida

(Notary Seal)

Vanessa Betz
Printed Name


Signature

My Commission Expires:

